

# **Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template**

## **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for **2012** covering the prior calendar year **2011**

1. Date filed: **1/30/12**
2. Name of company(s) covered by this certification: **CAS Communications, LLC**
3. Form 499 Filer ID: **828134**
4. Name of signatory: **Lisa Wilkinson**
5. Title of signatory: **Vice President**
6. Certification:

I, Lisa Wilkinson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

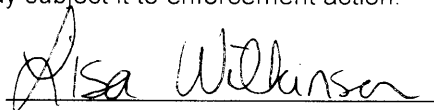
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



**Attachments:**      Accompanying Statement explaining CPNI procedures  
                                 Explanation of actions taken against data brokers (if applicable)  
                                 Summary of customer complaints (if applicable)

CAS Communications, LLC  
1525 Dupont Rd  
Parkersburg, WV 26101  
Phone: 304-420-2470  
Fax: 304-420-2474

FCC  
445 12<sup>th</sup> St SW  
Washington, D.C. 20554

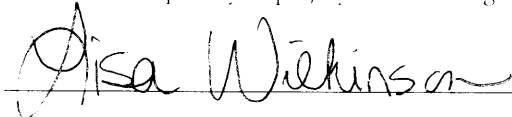
Re: CPNI Policies

CAS Communications, LLC has in place a policy regarding the protection of the confidentiality of customer information provided to any employee, contractor, agent, affiliate or partner of CAS Communications, LLC. CAS Communications, LLC requires all employees or agents who have any contact with customers or customer information to agree to the policies set forth in our written CPNI policy. Signed employee agreements are kept on file at our main office once the employee or agent has been trained. Our CPNI policy includes the proper procedures for disclosing CPNI information to the owner of the telephone number as well as the recordkeeping requirements and terms. The policy also includes the notification methods for any unauthorized disclosure of CPNI to the appropriate person and procedures for supervisory review.

CAS Communications, LLC does not sell any customer information to third parties, does not engage in any outbound telemarketing to customers for the purpose of upgrading to a higher level of service, and does not employ any retention or win-back efforts when a customer chooses to disconnect. Our largest concern with the CPNI was insuring that all customer information was given complete privacy. However, we did put in our policy information on all types of customer privacy issues to insure that our employees know the practices and procedures at all levels.

Please let me know if there is any further information that is required of our company.

I declare under penalty of perjury that the foregoing is true and correct.



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Lisa Wilkinson  
Vice President

Executed on January 30, 2012